

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JESSIE BOUDRIE

Defendant.

No. 2:17-cv-14025-GCS-EAS
Hon. George Caram Steeh

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2018 APR 13 PM 3:55

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DEFENDANT'S ANSWER TO AMENDED COMPLAINT

Introduction

1. In response to ¶1, defendant denies this allegation for the reason it is untrue.
2. In response to ¶2, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
3. In response to ¶3, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
4. In response to ¶4, defendant denies this allegation for the reason it is untrue.
5. In response to ¶5, defendant denies this allegation for the reason it is untrue.
6. In response to ¶6, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.

Jurisdiction and Venue

7. In response to ¶7, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
8. In response to ¶8 (i)-(ii) inclusive, defendant denies these allegations for the reason they are untrue.
9. In response to ¶9, defendant denies these allegations for the reason they are untrue.

Parties

10. In response to ¶10, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
11. In response to ¶11, admitted.

Factual Background

12. In response to ¶12, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
13. In response to ¶13, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
14. In response to ¶14, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
15. In response to ¶15, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
16. In response to ¶16, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
17. In response to ¶17, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.

18. In response to ¶18, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
19. In response to ¶19, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
20. In response to ¶20, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
21. In response to ¶21, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
22. In response to ¶22, defendant denies this allegation for the reason it is untrue.
23. In response to ¶23, defendant denies this allegation for the reason it is untrue.
24. In response to ¶24, defendant denies this allegation for the reason it is untrue.
25. In response to ¶25, defendant denies this allegation for the reason it is untrue.
26. In response to ¶26, defendant denies this allegation for the reason it is untrue.
27. In response to ¶27, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
28. In response to ¶28, defendant denies this allegation for the reason it is untrue.
29. In response to ¶29, defendant denies these allegations for the reason they are untrue.
30. In response to ¶30, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
31. In response to ¶31, defendant denies these allegations for the reason they are untrue.
32. In response to ¶32, defendant denies this allegation for the reason it is untrue.

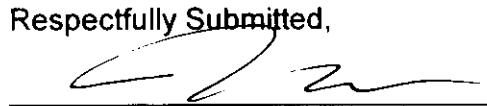
- 33. In response to ¶33, defendant is denies this allegation for the reason it is untrue.
- 34. In response to ¶34, defendant denies this allegation for the reason it is untrue.
- 35. In response to ¶35, defendant denies these allegations for the reason they are untrue.
- 36. In response to ¶36, defendant denies these allegations for the reason they are untrue.
- 37. In response to ¶37, defendant denies these allegations for the reason they are untrue.
- 38. In response to ¶38, defendant denies this allegation for the reason it is untrue.
- 39. In response to ¶39, defendant denies these allegations for the reason they are untrue.

COUNT I

- 40. Defendant adopts paragraphs 1-39 by reference.
- 41. In response to ¶41, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
- 42. In response to ¶42, defendant denies this allegation for the reason it is untrue.
- 43. In response to ¶43, defendant is without information or knowledge sufficient to form a belief as to the truth this allegation and therefore denies it.
- 44. In response to ¶44 (A)-(D) inclusive, defendant denies these allegations for the reason they are untrue.
- 45. In response to ¶45, defendant denies this allegation for the reason it is untrue.

Based on the above, defendant requests that this court dismiss plaintiff's complaint.

Respectfully Submitted,



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DATED: April 13, 2018

AFFIRMATIVE DEFENSES

1. Plaintiffs' claims are barred because of assumption of risk, estoppel, fraud, illegality, laches, license, release, res judicata, statute of frauds, statute of limitations, or waiver.
2. Plaintiff has failed to state a claim upon which relief can be granted.
3. This is no genuine issue as to any material fact and the Defendant is therefore entitled to judgment or partial judgment as a matter of law.
4. Plaintiff's claims are barred by lack of subject-matter jurisdiction, lack of personal jurisdiction, improper venue, insufficient process, or insufficient service of process,.
5. Plaintiff's claims are barred as enforcement of its alleged claims would violated public policy.

Respectfully Submitted,



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DATED: April 12, 2018

RELIANCE ON JURY DEMAND

Defendant relies upon plaintiff's jury demand in this action.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this document was served upon all parties of record by first class mail on April 13, 2018.

A handwritten signature in black ink, appearing to read 'Jessie Boudrie', is written over a horizontal line.

Jessie Boudrie
In Pro Per

DATED: April 13, 2018